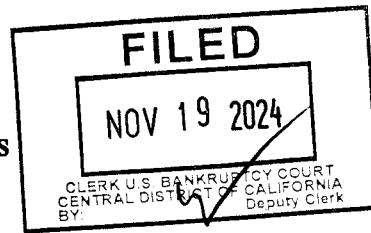


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Plaintiff & Plaintiff in Pro Se

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA**

In re:

MS. AMY LYNNE BLALOCK, an
individual;

Debtor,

DR. STEWART LUCAS MURREY, an
individual;

Plaintiff,

MS. AMY LYNNE BLALOCK, an
individual;

Defendant.

Adversary Complaint Case No.

24-ap-01152-BR

[Assigned to: Hon. Judge Barry Russell]

**PLAINTIFF DR. MURREY'S
NOTICE AND MOTION TO
COMPEL DEFENDANT MS.
BLALOCK'S RESPONSES TO
INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF
DOCUMENTS; AND REQUEST FOR
SANCTIONS**

Hearing Date:

Hearing Time:

Courtroom: 1668

Judge: Hon. Barry Russell

NOTICE IS HEREBY GIVEN of plaintiff Dr. Stewart Lucas Murrey's motion to
compel defendant Ms. Amy Blalock's responses to plaintiff's interrogatories and
requests for production of documents and request for sanctions before the honorable
Barry Russell: judge of the United States Bankruptcy Court for the Central District

1 of California, Western Division, located in the Edward Roybal Federal Building at
2 255 E. Temple Street, Courtroom 1668, Los Angeles, CA 90012.

3 This motion is made pursuant to Federal Rules of Bankruptcy Procedure ("Fed.
4 R. B. P.") 7026, 7033, 7034 and 7037; and Federal Rules of Civil Procedure ("Fed.
5 R. C. P.") 33, 34, 36 and 37, on the basis that defendant has failed to respond
6 whatsoever to plaintiff's interrogatories and requests for production of documents
7 and that defendant has failed to meet & confer in good faith. Consequently, plaintiff
8 requests that this Court order the following:
9

10
11 (1) Defendant has waived all objections to interrogatories and requests for
12 production of documents;
13

14 (2) Defendant must comply with Rule 33 and respond to interrogatories without
15 objections;
16

17 (3) Defendant must comply with Rule 34 and respond to requests for production
18 of documents without objections;
19

20 (4) Under Rule 37 plaintiff should be awarded sanctions in the amount to be
21 determined by this court as a result of defendant's failure to comply with
22 court rules.

23 **Local Rule 37-1 Meet and Confer Efforts:**
24

25 Pursuant to Local Rule ("LR") 37-1 (and LR 7-3), plaintiff in good faith sent
26 defendant several meet & confer letters to resolve this discovery matter without
27 court intervention and has sent, in good faith, his drafted joint stipulation to
28

1 defendant Ms. Blalock, though she has also failed to respond and provide her half of
2 said stipulation (see the declaration of plaintiff Dr. Stewart Lucas Murrey ¶¶ 20-21,
3 Exh. I).

4
5 This motion is based on this notice of motion and motion, the attached
6 memorandum of points and authorities and the attached joint stipulation, and
7 declaration of plaintiff Dr. Murrey filed concurrently herewith, the attached exhibits,
8 the pleadings and records on file in this action, other matters of which the court may
9 take judicial notice, and such matters as may be presented at the hearing on the
10 motion.
11

12
13
14 Dated: 19 November 2024

Respectfully submitted,

15
16 By:


Dr. Stewart Lucas Murrey

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19 **PRELIMINARY STATEMENT RE LOCAL RULE 37-1**

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21 On 10 October 2024 plaintiff served Ms. Blalock with requests for admission
22 (no.s 1 – 19), interrogatories (no.s 1 – 20) and requests for production of documents
23 (decl. Dr. Murrey ¶¶ 12-13, 18-19, Exh. E & H). After Ms. Blalock failed to respond
24 timely to plaintiff's interrogatories and requests for production of documents
25 plaintiff sent her a meet & confer letter on 10 November 2024 informing her that by
26 failing to respond within 30 days she has waived all objections and needed to
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1 provide complete and thorough responses without any objections (decl. Dr. Murrey
2 ¶¶ 20-21, Exh. I). Defendant responded on 13 November 2024 wherein she
3 frivolously sought to evade responding (Ibid.). In good faith plaintiff responded with
4 a second meet & confer letter advising defendant once again that he would file a
5 motion to compel if she continued to fail to respond with proper responses without
6 objections (Ibid.). Ms. Blalock then responded on 13 November 2024 informing
7 plaintiff that: “you [he] can seek your motion to compel” (Ibid.). Further, on 17
8 November 2024 defendant improperly responded to plaintiff’s interrogatories with
9 objections while she continued to fail to provide good faith complete and thorough
10 responses to his interrogatories (decl. Dr. Murrey ¶ 22, Exh. J).

14 Given that defendant has made usually harmful statements about plaintiff and
15 that both parties here are self-represented, plaintiff has in good faith exhausted all
16 reasonable means of obtaining proper discovery responses and thus this motion is
17 necessary.
18

19 **I. STATEMENT OF FACTS**
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21 In 2023 plaintiff discovered that he was the victim of a cyberbully attack that
22 included, but was not limited to over three-hundred (300) different Facebook
23 accounts. After filing reports with the LAPD and FBI and informing Facebook he
24 filed a state lawsuit (see LASC case no. 23STCV14890). Although defendants
25 sought to evade service, there are now four (4) named defendants who have been
26 served, including Ms. Blalock. Further, the state court has made it clear in its recent
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1 rulings that plaintiff has made a prima facie showing such that he will be given
2 authorization for limited third-party discovery to unmask, locate and serve at least
3 four further defendants, including those who are anonymous and/or using fake
4 names/accounts. Finally, plaintiff has filed a motion for leave to amend his state
5 complaint to bring Facebook into this matter as another defendant for its product
6 liability (defective algorithm(s)), negligence and deceptive business practices.
7

8
9 Unusually malicious statements about plaintiff occurred specifically in Facebook
10 groups such as, but not limited to: “Are We Dating The Same Guy?” (“AWDTSG”),
11 which has Facebook groups located in hundreds of cities around the world and with
12 tens of millions of members, if not more, from Facebook’s four (4) billion user-base.
13 Said AWDTSG Facebook groups are aggressively secretive and anonymous to elude
14 responsibility for their crimes and civil torts. Like Facebook itself, these Facebook
15 groups are controlled by anonymous creators, administrators and moderators who
16 collectively refused to allow their victims such as plaintiff to join any of these
17 groups to defend themselves.
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21 Facebook AWDTSG group members stated that “public records show” [that
22 plaintiff has] involvement in [a] MURDER case of his ex[-]wife”, is “suspected of
23 murder”; [h]as several domestic violence charges filed against him”; is an “abusive
24 murderer”; “[has] “[f]iled [...] court cases against women [...] trying to extort
25 money from them”; “has committed fraud”; “has acted fraudulently”, “has STDs”,
26 has an “ex-wife who [he] killed”; “claim[s] he is an attorney”; and that plaintiff is
27
28

1 listed on the California court's public record as being a "vexatious litigant" (decl.
2 Dr. Murrey ¶¶ 3-4, Exh. A). All of these statements are false (decl. Dr. Murrey ¶ 5).
3 Of the hundreds of Facebook accounts involved not a single woman has come
4 forward who plaintiff has ever met in person other than one who plaintiff only met
5 for less than fifteen minutes because plaintiff saw that she did not resemble her
6 pictures and he refused to go on a date with her and politely excused himself
7 forthwith (Ibid.). Of the remaining Facebook accounts only a small fraction of
8 women (so far only three) have had any communication with plaintiff e.g. via a few
9 text messages and plaintiff rejected each and every one (Ibid.). Said cyber-attack has
10 led to off-line harassment of plaintiff, his loved ones, family, friends, colleagues and
11 anyone perceived to be associated with plaintiff, he has received multiple death
12 threats and suffered serious damages, including, but not limited to the loss of
13 income and potential work and he is currently being treated for the severe harm he
14 suffered (decl. Dr. Murrey ¶¶ 3-5, Exh. A).

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19 Among the goals of these unusually malicious statements and cyber-attack and
20 now a national and international news media smear campaign, is the creation of
21 mass web-traffic, "click-bait", drawing attention to one-self and obtaining
22 "Facebook money", money via GoFundMe.com donations, and money from
23 securing a Netflix deal for a docu-series (decl. Dr. Murrey ¶¶ 6-7, Exh. B). Members
24 of Facebook's AWDTSO groups and defendants in plaintiff's case have also been
25 caught harassing men who have passed away (and thus who cannot harm anyone)
26
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1 and the families of men, including their wives and children, who refused to have
2 one-night stands with them (decl. Dr. Murrey ¶¶ 8-9, Exh. C). Instead of being a
3 safe place for women to protect one another from “bad dates”, Facebook and its
4 AWDTSO groups are places where drunk women form secret conspiracies to
5 criminally cyber-attack men while they openly admit to suffering from psychological
6 disorders (Ibid.).
7

8
9 Defendant Blalock plays a critical role in this Facebook cyber-assault and
10 defamation. Blalock stated in Facebook AWDTSO groups that plaintiff: 1) violently
11 stole one of her mobile phones; 2), that plaintiff invites women he dates to a “second
12 location” because there he murders them; 3) that plaintiff has “something to do
13 with” all “missing women in LA”; 4) that plaintiff is going to end up on “Dateline”
14 for all his murders; 5) that plaintiff is similar to the infamous *Tinder Swindler*
15 because plaintiff has also committed fraud and stolen large amounts of money; 6)
16 that she secretly recorded plaintiff; and 7) that for these reasons plaintiff should be
17 abandon his home and residence where he has lived for a decade and give in to her
18 bullying tactics and leave Los Angeles (decl. Dr. Murrey ¶¶ 10-11, Exh. D).
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22 Blalock has admitted in her verified responses to plaintiff’s requests for
23 admission, specifically her response to RFA no. 5, that she received GoFundMe
24 money for her webpage that she undersigned with several others and whereupon she
25 defamed plaintiff by falsely accusing him of stalking a woman named Elly Shariat
26 who in truth and actual fact plaintiff does not know and never stalked (decl. Dr.
27
28

1 Murrey ¶¶ 12-13, Exh. E). Ms. Shariat is currently a defendant in plaintiff's afore-
2 mentioned state case (LASC case no. 23STCV14890). Although Shariat has
3 aggressively evaded service, plaintiff has successfully brought Shariat into his state
4 lawsuit via a publication of service. Shariat is currently being sued for her malicious
5 stalking story that Blalock undersigned and used to illegally obtain GoFundMe
6 money (Ibid.). Blalock has also obtained Facebook money via Facebook points
7 (decl. Dr. Murrey ¶¶ 14-15, Exh. F). And Blalock has attempted to obtain money
8 from securing a Netflix deal for her malicious statements against plaintiff in an
9 envisioned docu-series (decl. Dr. Murrey ¶¶ 16-17, Exh. G).

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13 Meanwhile, to evade responsibility for her malicious statements and unjust
14 enrichment via the monetization of said intentional harm, Blalock filed a chapter
15 seven (7) bankruptcy complaint after her anti-SLAPP motion failed and her
16 discovery was due in said state case and plaintiff responded by filing the above-
17 captioned adversary proceeding. On 10 October 2024 plaintiff served Ms. Blalock
18 with interrogatories and requests for production of documents (decl. Dr. Murrey ¶¶
19 18-19, Exh. H). Said interrogatories and requests for production of documents are
20 vital for plaintiff to move his adversary proceeding forward and therefore must be
21 compelled.
22
23

24
25 **II. A MOTION TO COMPEL IS PROPER WHEN A PARTY FAILS**
26 **TO RESPOND TO DISCOVERY**
27
28

1 A motion to compel is the remedy available when a party fails to comply with its
2 discovery obligations. Here Federal Rules of Bankruptcy Procedure ("Fed. R. B.
3 P.") 7026, 7033 and 7034 applies Fed. R. Civ. P., including, but not limited to Fed.
4 R. Civ. P. 37(a)(1). Under Rule 37, a party may file a motion to compel discovery
5 responses, including according to Rules 37(a)(3)(B) et. al. motions to compel
6 responses to interrogatories and responses to document requests. Because defendant
7 failed to respond properly to plaintiff's written discovery, plaintiff has a right to
8 seek a court order compelling compliance under Rule 37.
9

10
11 The aforementioned interrogatories and requests for production of documents are
12 all basic and critical information to this case. Because Ms. Blalock failed to serve
13 timely responses to plaintiff interrogatories and requests for production of
14 documents she has waived all objections. Therefore the court should require
15 defendant to respond clearly and thoroughly in good faith to plaintiff written
16 discovery.
17

18
19 **III. MONETARY SANCTIONS ARE APPROPRIATE WHERE**
20 **DEFENDANTS' COUNSEL FAILED TO COOPERATE**

21 Federal Rule of Civil Procedure Rule 37 (Fed. R. B. P. 7037) and Local Rule 37-
22 4 allows the court to impose sanctions where a party has failed to comply with or
23 cooperate in the meet and confer procedures under Local Rule 37-1. *Cable &*
24 *Computer Technology, Inc., supra*, 175 F.R.D. at 650 (sanctioning for failing to
25 comply with local rules requiring meet and confer efforts related to a discovery
26 dispute). As already discussed above, plaintiff properly propounded interrogatories
27
28

1 and requests for production of documents and properly met & conferred with
2 defendant in good faith to resolve this discovery dispute. To date, plaintiff has still
3 not received a reasonable response from defendant regarding his interrogatories and
4 requests for production of documents, thereby necessitating the present motion.
5

6 As set forth in plaintiff's declaration, this motion has cost a great deal of time
7 and resources (decl. Dr. Murrey ¶ 27). Therefore, plaintiff requests that he be
8 awarded sanctions in an amount found reasonable by this court, pursuant to Local
9 Rule 37-1.
10

11 **IV. CONCLUSION**
12

13 Based on defendants' non-compliance as outlined above, plaintiff respectfully
14 requests that this court order the following:
15

16 (5) Defendant has waived all objections to interrogatories and requests for
17 production of documents;

18 (6) Defendant must comply with Rule 33 and respond to interrogatories without
19 objections;
20

21 (7) Defendant must comply with Rule 34 and respond to requests for production
22 of documents without objections;
23

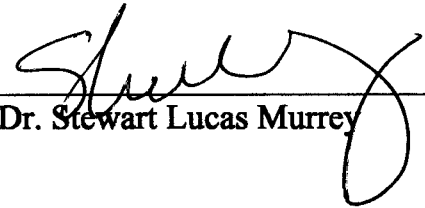
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25 //

1 (8) Under Rule 37 plaintiff should be awarded sanctions in the amount to be
2 determined by this court as a result of defendant's failure to comply with
3 court rules.
4

5 Dated: 19 November 2024

Respectfully submitted,

6
7
8 By:


Dr. Stewart Lucas Murrey

PROOF OF SERVICE

I declare as follows:

I am over the age of 18 years, and not a party to this action. My address is 1217 Wilshire Blvd. # 3655, Santa Monica, CA 90403, which is located in the county where the mailing described below took place. On 19 November 2024 I served the foregoing document(s) described as: Dr. Murrey's Notice and Motion to Compel and Request for Sanctions; Joint Stipulation, Declaration and Proposed Order in the matter of Dr. Murrey v. Blalock (Federal Bankruptcy Case No. 24-ap-01152-BR) to:

Amy Lynne Blalock
1001 Gayley Ave. # 24381
Los Angeles, CA 90024
Tel. (310) 569-6182
Email: amyblalock@gmail.com

I served a true copy of the document(s) above:

☐ By United States mail. I enclosed the documents in a sealed envelope or package addressed to the person(s) at the address(es) mentioned above and:

☐ placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage full prepaid.

☒ By e-mail or electronic transmission. Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the document(s) to be sent to the person(s) at the e-mail address(es) listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐ I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

☒ I hereby certify under the penalty of perjury that the foregoing is true and correct. Executed on 19 November 2024 at Los Angeles, California.


Declarant